

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KHALED ELSISI, et al.,

Civil Action No. 2:23:cv-20773

Plaintiffs,

v.

Motion Return Date: August 18, 2025

CFT SOLUTIONS, et al.,

Defendants.

**NOTICE OF DEFENDANTS' MOTION TO COMPEL PRODUCTION,
ATTENDANCE AT DEPOSITIONS, AND FOR SANCTIONS**

PLEASE TAKE NOTICE that upon the accompanying Motion to Compel Production, Attendance at Depositions, and for Sanctions, Brief in Support of Motion to Compel Production, Attendance at Depositions, and for Sanctions, and Declaration of Justin B. Kaplan, Defendants, CFT Solutions, LLC, Renan De Rocha Gomes Bastos, and Arthur Percy (collectively, "Defendants"), through undersigned counsel, will move this Court before the Honorable Michael E. Farbiarz, on August 18, 2025, or a different date which the Court deems appropriate, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street Room 4015, Newark, NJ 07101, for an order compelling Plaintiffs to produce all documents responsive to Defendants' Jurisdictional Discovery Requests, compelling each Plaintiff to coordinate the date of their deposition concerning the basis for specific personal jurisdiction and thereafter attend such deposition, and for Sanctions against Plaintiffs, as well as granting such other and further relief as deemed just and proper.

Date: July 17, 2025

Respectfully submitted,

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**DEFENDANTS' MOTION TO COMPEL PRODUCTION,
ATTENDANCE AT DEPOSITIONS, AND FOR SANCTIONS**

Defendants, CFT Solutions, LLC, Renan De Rocha Gomes Bastos, and Arthur Percy (collectively, "Defendants"), through undersigned counsel and pursuant to Fed. R. Civ. P. 34 and 37, D.N.J. L. Civ. R. 7.1 and 37.1, as well as this Court's Third Amended Jurisdictional Scheduling Order [D.E. 137], file this Motion to Compel Production, Attendance at Depositions, and for Sanctions (the "Motion"). In support of the Motion, Defendants refer to and rely upon the Brief filed contemporaneously herewith in support of their Motion, and expressly incorporate it by reference.

WHEREFORE, Defendants, CFT Solutions, LLC, Renan de Rocha Gomes Bastos, and Arthur Percy, respectfully request that this Court grant the Motion and issue an Order compelling Plaintiffs to produce all documents responsive to the Requests for Jurisdictional Discovery served upon them, compelling each Plaintiff to coordinate the date of their jurisdictional depositions and thereafter attend such deposition, as well as granting such other and further relief as deemed just and proper.

Date: July 17, 2025

Respectfully submitted,

**NELSON MULLINS RILEY &
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Clarification and to Compel Attendance at Deposition has been served by electronic mail upon Plaintiffs and all counsel of record.

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Dated: July 17, 2025

**NELSON MULLINS RILEY &
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